

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PILKINGTON NORTH AMERICA, INC.,

Plaintiff,

v.

MITSUI SUMITOMO INSURANCE
COMPANY OF AMERICA and AON
RISK SERVICES CENTRAL, INC.,

Defendants.

Case No. 1:18-cv-08152-JFK

MITSUI SUMITOMO INSURANCE
COMPANY OF AMERICA.

Third-Party Plaintiff,

v.

AON UK LIMITED, NIPPON SHEET
GLASS CO., LTD., and MITSUI
SUMITOMO INSURANCE CO. LTD.,

Third-Party Defendants.

NOTICE OF MOTION TO DISMISS UNDER FED. R. CIV. P. 12(b)(2) AND 12(b)(6)

Aon UK Limited (“Aon UK”), pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), hereby moves the Court to dismiss the claims against it set forth in Mitsui Sumitomo Insurance Company of America’s (“MSI”) Third-Party Complaint (Dkt. No. 115). As discussed in the accompanying Memorandum of Law, MSI has not satisfied its burden of demonstrating personal jurisdiction over Aon UK. Alternatively, MSI fails to state a claim against Aon UK upon which relief may be

granted. Accordingly, the Court should dismiss MSI's claims against Aon UK in their entirety pursuant to Rules 12(b)(2) and 12(b)(6).

Dated: September 21, 2020

Respectfully submitted,

/s/ Robert B. Ellis

Robert B. Ellis, P.C. (admitted *pro hac vice*)
Rana B. Dawson (admitted *pro hac vice*)
Michael S. Biehl (admitted *pro hac vice*)
Kelsey Bleiweiss (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654-3406
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: robert.ellis@kirkland.com
Email: rana.barakat@kirkland.com
Email: michael.biehl@kirkland.com
Email: kelsey.bleiweiss@kirkland.com

--and--

Lauren Casazza, P.C. (NY Bar 4038824)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: lcasazza@kirkland.com

Attorneys for Aon UK Limited